

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Albert Russo
CN 4853
Trenton, NJ 08650
(609) 587-6888
Standing Chapter 13 Trustee

In re:

Tracey L. Gladden

Debtor(s)

Case No. 20-15557 / MBK

Hearing Date: June 16, 2020 10:00 am

Judge: Michael B. Kaplan

Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s):
-excessive expense Schedule J \$710/car payment (allowed \$508)
-Form 122c-2 Line 45 shows monthly disposable income \$1,019.18 which requires minimum \$61,150.80 dividend to general unsecured creditors

Schedules A and C must be updated to include the debtor's rental property at 118 Wildflower Place Delran NJ. Schedule I & J must also be updated to include the mortgage and rent.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Erik Collazo, Staff Attorney